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| <b>Company Name</b>            | NOW Education  |
| <b>Company contact details</b> | 3 <sup>rd</sup> Floor Pinnacle House, 8 Harborne Road, Birmingham, B15 3AA<br>0121 452 2041<br>info@noweducation.co.uk |
| <b>Title</b>                   | Privacy Notice   |
| <b>Author</b>                  | Alex Westworth   |
| <b>Date</b>                    | 27/10/2023   |
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The Company is a recruitment business which provides work-finding services to its clients and work-seekers. The Company must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may give your personal details to the Company directly, such as on an application or registration form or via our website, or we may collect them from another source such as a jobs board. The Company must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you, we will only use your personal data in accordance with this privacy statement. At all times we will comply with current data protection laws.



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# 01. Collection and use of *personal* data

## a. Purpose of processing and legal basis

The Company will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing you with work-finding services. This includes, for example, contacting you about job opportunities, assessing your suitability for those opportunities, updating our databases, putting you forward for job opportunities, arranging payments to you and developing and managing our services and relationship with you and our clients.

If you have opted-in, we may also send you marketing information and news via email/ text. You can opt-out from receiving these at any time by clicking “unsubscribe” when you receive these communications from us.

In some cases we may be required to use your data for the purpose of investigating, reporting and detecting crime and also to comply with laws that apply to us. We may also use your information during the course of internal audits to demonstrate our compliance with certain industry standards.

We must have a legal basis to process your personal data. The legal bases we rely upon to offer our work-finding services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with you





## **b. Legitimate interest**

This is where the Company has a legitimate reason to process your data provided. It is reasonable and does not go against what you would reasonably expect from us. Where the Company has relied on a legitimate interest to process your personal data, our legitimate interests is/are as follows:

- Managing our database and keeping work-seeker records up to date;
- Providing work-finding services to you and our clients;
- Contacting you to seek your consent where we need it;
- Giving you information about similar products or services that you have used from us recently

## **c. Statutory/contractual requirement**

The Company has certain legal and contractual requirements to collect personal data (e.g. to comply with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, immigration and tax legislation, and in some circumstances safeguarding requirements.)

Our clients may also require this personal data, and/or we may need your data to enter into a contract with you. If you do not give us the personal data we need to collect, we may not be able to continue to provide work-finding services to you.





#### **d. Recipient/s of data**

The Company will process your personal data and/or sensitive personal data with the following recipients:

- Clients (whom we may introduce or supply you to)
- Former employers whom we may seek references from
- Payroll service providers who manage payroll on our behalf or other payment intermediaries whom we may introduce you to.
- Other recruitment agencies in the supply chain
- The only time we'll share your information with anyone besides those listed above, is if it's to prevent fraud, or if required by law.

## **02. Source of data**

We source work seekers data by two different methods, either directly from you when registering with us or obtaining your Curriculum Vitae (C.V.) and contact details via a job board you have uploaded it to.

It is important that the personal information we hold about you is accurate and current. Please keep us informed by emailing your recruitment consultant if your personal information changes during the period which we hold your data.

You may provide NOW Education with details of other individuals (including, without limitation, referees and next of kin/persons to be contacted in an emergency). By doing so you are confirming that you have that person's consent to provide us with their details, to process the information for the intended purpose and to contact them for the intended purpose if necessary and/or appropriate.

## **03. Data retention**

The Company will retain your personal data only for as long as is necessary for the purpose we collect it. Different laws may also require us to keep different data for different periods of time. In general, data will be used in the following way (as informed at point of registration).



|  | <b>Schools</b><br>(where we send you to work) | <b>Outsourced Payroll Provider</b><br>(to process your pay) | <b>Other Candidates</b> | <b>Competitors</b><br>(except for references with your permission) | <b>Relevant Authorities*</b> | <b>General Public Marketing Activity</b><br>(including web, social media and print) |
|--|---|---|-------------------------|--|------------------------------|---|
| Your Name  | ✓   | ✓   | ✗                       | ✗  | ✓                            | ✗   |
| Your Address   | ✗   | ✓   | ✗                       | ✗  | ✓                            | ✗   |
| Phone Numbers  | ✗   | ✓   | ✗                       | ✗  | ✓                            | ✗   |
| Email Address  | ✗   | ✓   | ✗                       | ✗  | ✗                            | ✗   |
| Date of birth  | ✓   | ✓   | ✗                       | ✗  | ✓                            | ✗   |
| Work History   | ✓   | ✗   | ✗                       | ✗  | ✓                            | ✗   |
| Relevant Qualifications                                  | ✓   | ✗   | ✗                       | ✗  | ✓                            | ✗   |
| Relevant Medical History                                 | ✓   | ✗   | ✗                       | ✗  | ✗                            | ✗   |
| Bank Details & NI Number                                 | ✗   | ✓   | ✗                       | ✗  | ✗                            | ✗   |
| Passport/Visa and/or Birth Certificate details           | ✓   | ✓   | ✗                       | ✗  | ✗                            | ✗   |
| DBS Number & Issue Date                                  | ✓   | ✗   | ✗                       | ✗  | ✓                            | ✗   |
| Cautions, convictions, blindovers or custodial sentences | ✗   | ✗   | ✗                       | ✗  | ✗                            | ✗   |
| Agreed Contract for Services                             | ✗   | ✓   | ✗                       | ✗  | ✓                            | ✗   |



## 04. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data the Company processes on you;
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data;
- The right to erasure of your personal data in certain circumstances;
- The right to restrict processing of your personal data;
- The right to data portability in certain circumstances;
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling; and
- The right to withdraw consent at any time.

Where you have consented to the Company processing your personal data and sensitive personal data you have the right to withdraw that consent at any time by contacting Alex Westworth, Managing Director, NOW Education, 7th Floor Cobalt Square, Hagley Road, Birmingham, B16 8QG. Please note that if you withdraw your consent to further processing that does not affect any processing done prior to the withdrawal of that consent, or which is done according to another legal basis.

There may be circumstances where the Company will still need to process your data for legal or official reasons. Where this is the case, we will tell you and we will restrict the data to only what is necessary for those specific reasons.

If you believe that any of your data that the Company processes is incorrect or incomplete, please contact us using the details above and we will take reasonable steps to check its accuracy and correct it where necessary.

**You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above. If you make a SAR we have 30 days to respond and give you the information.**



## 05. Cookies

### **NOW Education cookie policy**

This website uses “cookies”. A cookie is a small amount of data, which often includes an anonymous unique identifier, which is sent to your browser from a website’s computer and stored on your computer’s hard drive, if your browser settings permit it.

When you use this website, NOW Education may set and access cookies (or have these cookies set and accessed) on your computer as described below. If you do not agree to this use of cookies, you can adjust your browser settings to reject all cookies (each browser is different, so check the “Help” menu of your browser to learn how to do this). Alternatively you can choose not to use the website.

If you choose to reject all cookies using your browser settings, you may not be able to use NOW Education products, services and/or websites that require you to log in. However, many of NOW Education’s online services do not require you to accept cookies.

Please note that if you choose to continue with use of this website without taking any further action in relation to cookies, we will consider that you agree to the use of cookies as described below.

### **NOW Education’s use of cookies**

When you use this website, cookies are set and accessed by or on behalf of NOW Education for a number of purposes, including to:

- access your information when you “sign in” to NOW Education’s website
- keep track of preferences you specify while you are using NOW Education’s services;
- estimate and report our total audience size and traffic;
- conduct research to improve NOW Education’s content and services; and/or
- NOW Education does not use cookies to target advertising or to share information with social networking sites or other services.



## Google Analytics Cookies

In addition, NOW Education uses Google Analytics to help analyse how users use our websites. This analytical tool uses a cookie set by Google to collect standard internet log information and visitor behaviour information in an anonymous form. The information generated by the Google analytics cookie about your use of any website (including your IP address) is transmitted to Google, and used to evaluate and compile statistical reports about this use for NOW Education.

NOW Education will not (and will not allow any third party to) use the statistical analytics tool to track or collect any personally identifiable information about users of our sites, and will not associate any data gathered by means of the Google statistical tool with any personally identifying information.

You can find more information about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) or [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

## 06. Login *files*

We use IP addresses to analyse trends, administer the site, track users' movements, and to gather broad demographic information for aggregate use. IP addresses are not linked to personally identifiable information.

## 07. Links to *external* websites

The Company's website may contain links to other external websites. Please be aware that the Company is not responsible for the privacy practices of such other sites. When you leave our site we encourage you to read the privacy statements of each and every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Company's website.

## 08. Sale of the *business*

If the Company's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.



## 09. Data *security*

The Company takes every precaution to protect our users' information.

Only employees who need the information to perform a specific job are granted access to your information.

The Company uses all reasonable efforts to safeguard your personal information. However, you should be aware that the use of email/ the Internet is not entirely secure and for this reason the Company cannot guarantee the security or integrity of any personal information which is transferred from you or to you via email/ the Internet.

If you share a device with others we recommend that you do not select the "remember my details" function when that option is offered.

**If you have any questions about the security at our website, you can email Alex Westworth – [alex.westworth@noweducation.co.uk](mailto:alex.westworth@noweducation.co.uk)**

## 10. Changes to this *privacy statement*

We will update this privacy statement from time to time. We will post any changes on the statement with revision dates. If we make any material changes, we will notify you.

## 11. Complaints or *queries*

If you wish to complain about this privacy notice or any of the procedures set out in it please contact Alex Westworth, Managing Director, NOW Education, 7th Floor Cobalt Square, Hagley Road, Birmingham, B16 8QG.

You also have the right to raise concerns with Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/concerns/>, or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.